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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

NULEAF NATURALS, LLC, a Colorado
Limited Liability Company,

Plaintiff,

v.

JUSHI NV, INC., a Delaware Corporation;
NULEAF INCLINE DISPENSARY, LLC, a
Nevada Limited Liability Company; NULEAF
CLV DISPENSARY, LLC, a Nevada Limited
Liability Company; and NULEAF CLARK
DISPENSARY, LLC, a Nevada Limited
Liability Company,

Defendants.

Case No. 2:24-cv-02075-CDS-DJA

**STIPULATION TO STAY DISCOVERY
AND AMEND SCHEDULING ORDER
PENDING SETTLEMENT
NEGOTIATIONS**

(FIRST REQUEST)

Pursuant to Federal Rules of Civil Procedure 16(b)(4) and 26(c), and Local Rules 7-1 and 26-3, Plaintiff NuLeaf Naturals, LLC (“NuLeaf” or “Plaintiff”) and Defendants, Jushi NV, Inc., NuLeaf Incline Dispensary, LLC, NuLeaf CLV Dispensary, LLC and NuLeaf Clark Dispensary, LLC (collectively, “Jushi” or “Defendants,” together with Plaintiff the “Parties”), by and through their respective undersigned counsel of record, hereby stipulate and respectfully request that the court stay discovery and amend the Stipulated Discovery Plan and Scheduling Order (as Amended) entered in the above action. (ECF 26). In support thereof, the Parties state as follows:

1 1. On December 3, 2024, the Court granted the Parties' Stipulation to Extend Deadline
2 to Respond to Plaintiff's Complaint for Injunction for Trademark Infringement (First Request)
3 (ECF No. 16).

4 2. On January 3, 2025, Defendants filed their Answer to Plaintiff's Complaint and
5 Counterclaims (ECF No. 17).

6 3. On January 24, 2025, the Court granted the Parties' Stipulation to Extend Time to
7 Answer or Otherwise Respond to the Counterclaim (First Request) (ECF No. 19).

8 4. On January 28, 2025, Plaintiff filed its Answer to Defendants' Counterclaims (ECF
9 No. 20).

10 5. On February 18, 2025, Defendants filed their Amended Answer to Complaint; and
11 Counterclaims. (ECF No. 24).

12 6. On February 25, 2025, the Court granted in part and denied in part the Parties'
13 Discovery Plan and Scheduling Order. (ECF No. 26).

14 7. On March 4, 2025, Plaintiff filed its Answer to Amended Counterclaims. (ECF No.
15 27),

16 8. On May 7, 2025, Plaintiff filed an Unopposed Motion to Amend Complaint. (ECF
17 No. 28).

18 9. On May 8, 2025, the Court, granted Plaintiff's Motion to Amend Complaint, ordered
19 Plaintiff to file and serve the amended complaint (ECF No. [28-1]) as required by Local Rule 15-
20 1(b). (ECF No. 29).

21 10. On May 9, 2025, Plaintiff filed its First Amended Complaint and the parties have
22 agreed that Defendant will answer within twenty (20) days after Plaintiff declares settlement
23 negotiations finished or at an impasse.

24 11. No trial date has been set in this matter.

25 12. The parties are actively engaged in good faith settlement negotiations to resolve this
26 matter without further litigation. The parties believe that a temporary stay of discovery and
27 modification of the scheduling order will conserve judicial resources and the parties' resources by
28 avoiding unnecessary discovery costs during these discussions.

1 13. The Parties submit that good cause exists for this request, as settlement negotiations
2 are ongoing, and a stay will promote efficiency and potentially resolve the case without further
3 court intervention. The parties have conferred and agree that a stay of discovery for 60 days is
4 appropriate to focus on settlement efforts.

5 14. Courts have “broad discretionary power to control discovery.” *Miller v. Republic*
6 *Silver State Disposal, Inc.*, 2022 WL 4355595, at *1 (D. Nev. Sept. 19, 2022) (citing *Little v. City*
7 *of Seattle*, 863 F.2d 681, 685 (9th Cir. 1988)). Consistent with that discretion and particularly when
8 the parties stipulate, this Court stays discovery when good cause exists and the pending motion can
9 be decided without further discovery. *Id.* at *1-2; *see also, e.g., Bloom v. Zuffa, LLC.*, 2023 WL
10 6197341, at *4 (D. Nev. Sept. 22, 2023).

11 15. The Parties request that the Court (a) stay all discovery obligations, including but
12 not limited to depositions, written discovery, and expert disclosures, for a period of 60 days from
13 the date of this Court’s Order; (b) extend all deadlines in the current Scheduling Order (ECF No.
14 26) including discovery cutoff, motion deadlines, and other related dates, by 60 days or as the Court
15 deems appropriate; and (c) require the Parties to file a Joint Status Report 30 days from the date of
16 this Order to update the Court on the status of settlement negotiations.

17 16. This stipulation is not intended to cause delay or prejudice any party’s rights or
18 defenses and is entered into solely to facilitate settlement discussions.

19 WHEREFORE, the Parties respectfully request that the Court grant this stipulation and
20 enter an order staying discovery and amending the scheduling order as set forth above.

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22
23 [Signature block and proposed order on following page.]
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25
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27
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DATED: July 23, 2025

DATED: July 23, 2025

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IT IS THEREFORE ORDERED that the parties' stipulation (ECF No. 31) is **granted in part and denied in part**. It is granted in part regarding the parties' request for a stay of discovery and for the Court to require them to file a joint status report. It is denied in part regarding the parties' request for an extension of discovery deadlines.

IT IS FURTHER ORDERED that discovery is stayed until **September 22, 2025**.

IT IS FURTHER ORDERED that the parties must file a joint status report regarding the status of their settlement negotiations on or before **September 22, 2025**. If the parties need additional time for their negotiations, they must also stipulate to extend the stay. If the parties wish to move forward with discovery, they must also stipulate to extend discovery deadlines.



DANIEL J. ALBRECHTS

UNITED STATES MAGISTRATE JUDGE

DATED: July 24, 2025